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11 Attorneys for Defendant  
FLAGSTAR BANCORP, INC.

12 [Additional counsel on signature page]  
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14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN JOSE DIVISION**

17 JANET POLLARD, individually and on  
18 behalf of all others similarly situated,

19 Plaintiff,

20 ACCELLION, INC., and FLAGSTAR  
21 BANCORP, INC. d/b/a FLAGSTAR BANK,

22 Defendants.  
23

Case No.: 5:21-cv-02572-EJD

**JOINT STIPULATION TO TOLL  
DEADLINES TO RESPOND TO  
PLAINTIFF'S COMPLAINT AND TO  
EXTEND THE TIME TO RESPOND TO  
PLAINTIFF'S COMPLAINT OR A  
CONSOLIDATED AMENDED  
COMPLAINT; AND**

**[PROPOSED] ORDER**

1 Plaintiff Janet Pollard (“Plaintiff”) and Defendant Flagstar Bancorp, Inc. (“Flagstar”)  
2 (collectively, the “Parties”) jointly stipulate, pursuant to Civil Local Rules 6-1(a), 6-2, and 7-12, to  
3 toll and extend the time for Flagstar to respond to Plaintiff’s Complaint.

4 WHEREAS, on April 8, 2021, Plaintiff filed her Complaint against Flagstar and Accellion,  
5 Inc. in the Northern District of California;

6 WHEREAS, in a number of civil actions now pending in this district (“Related Actions”),  
7 other plaintiffs have asserted related or similar claims to those made in this action against Flagstar  
8 and/or other defendants;

9 WHEREAS, on April 7, 2021, counsel for Plaintiff Beyer filed a motion to consolidate the  
10 Related Actions, and any other related actions filed in, removed to, or transferred to the Northern  
11 District of California pursuant to Federal Rule of Civil Procedure 42(a) and to set a briefing  
12 schedule for the appointment of interim co-lead class counsel (“Consolidation Motion”), in the case  
13 of *Brown v. Accellion, Inc.*, 5:21-cv-01155-EJD;

14 WHEREAS, on July 15, 2021, the Consolidation Motion is scheduled to be heard before  
15 the Honorable Judge Edward J. Davila;

16 WHEREAS, pursuant to Federal Rule of Civil Procedure 12, Flagstar’s deadline to respond  
17 to the Complaint is currently June 18, 2021;

18 WHEREAS, the Parties recognize that it would conserve resources and promote efficiency  
19 to toll and extend deadlines until after the resolution of the Consolidation Motion;

20 WHEREAS, pursuant to Local Rule 6-1(a), the Parties have agreed to toll and extend  
21 Flagstar’s deadline to respond to Plaintiff’s Complaint pending resolution of the Consolidation  
22 Motion;

23 Now therefore, pursuant to Local Rule 6-1(a), it is hereby stipulated and agreed, by and  
24 between the attorneys for the undersigned Parties, that:

- 25 1. Flagstar’s deadline to respond to Plaintiff’s Complaint shall be tolled.  
26 2. The Parties agree to promptly meet and confer and, within ten (10) days of the resolution of  
27 the Consolidation Motion, submit a proposed schedule for the filing of any further  
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1 Complaint, Flagstar's response to the Complaint, and any other applicable procedural  
2 deadlines based on the Court's resolution of the Consolidation Motion.

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4 **IT IS SO STIPULATED.**

5 DATED: June 16, 2021

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SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

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By: /s/ William E. Ridgway

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WILLIAM E. RIDGWAY

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Attorney for Defendant FLAGSTAR BANCORP, INC.

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DATED: June 16, 2021

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GLANCY PRONGAY & MURRAY LLP

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By: /s/ Jonathan Rotter

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JONATHAN ROTTER

Attorney for Plaintiff JANET POLLARD

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**[PROPOSED] ORDER**

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**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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DATED: \_\_\_\_\_, 2021

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The Honorable Edward J. Davila  
United States District Court Judge

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**E-FILING ATTESTATION**

I, William E. Ridgway, am the ECF user whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

DATED: June 16, 2021

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: /s/ William E. Ridgway  
WILLIAM E. RIDGWAY  
Attorney for Defendant FLAGSTAR BANCORP, INC.